November 4, 2014

Advice Letter 4352-E, 4352-E-A, 4352-E-B, and 4352-E-C

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

SUBJECT: 2013 Q4 Procurement Transaction Quarterly Compliance Filing

Dear Ms. Allen:


Sincerely,

Edward Randolph
Director, Energy Division
September 17, 2014

Advice 4352-E-C
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Procurement Transaction Quarterly Compliance Filing (Q4, 2013)

Pacific Gas and Electric Company (“PG&E”) is submitting this advice letter to the California Public Utilities Commission (“Commission” or “CPUC”) related to its Procurement Transaction Quarterly Compliance Report (“QCR”) for record period October 1, 2013, through December 31, 2013, (Q4-2013) to provide supplemental information that corrects certain information included in PG&E’s original submittal (Advice 4352-E), Confidential Attachments A, B, D, and M as described below.

Background

PG&E submitted its QCR for Q4-2013 on January 30, 2014 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the QCR be submitted within 30 days of the end of the quarter.

PG&E’s Q4-2013 QCR includes a number of Confidential Attachments that are reviewed by Commission Audit staff prior to approving the advice letter. During the course of this review, price calculation errors were detected for several reported transactions. PG&E is now submitting corrections for the items identified as incorrect. For each of these transactions, the incorrect price calculation was the result of either: 1) the transaction was priced in Canadian dollars but reported as US dollars, or 2) daily index prices were calculated without correctly accounting for a holiday. Specifically, the following attachments have been amended:

- Confidential Attachment A – Natural Gas Transactions
- Confidential Attachment B – Natural Gas Counterparty Information
- Confidential Attachment D – Natural Gas Transactions Summary
- Confidential Attachment M – Transactions Subject to Strong Showing
**Request**

PG&E’s request the Commission approve Advice 4352-E, 4352-E-A, 4352-E-B and 4352-E-C which includes amendments for Confidential Attachments A, B, D, and M as described above.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 7, 2014, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4th Floor  
San Francisco, California  94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California  94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Rule 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was
submitted to the reviewing Industry Division (General Order 96-B, Rule 3.11).

**Effective Date**

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is October 17, 2014, which is 30 days after the date of filing.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter, excluding the confidential appendices, is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for Rulemaking (“R.”) 12-03-014, R.01-10-024, and R.11-10-023. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs.

____________________/
Meredith Allen
Senior Director, Regulatory Relations

cc: Service List R.12-03-014, R.01-10-024, R.11-10-023.
PGE’s Procurement Review Group

Public Attachment: Attachment 1 – Confidentiality Declaration and Matrix
# CALIFORNIA PUBLIC UTILITIES COMMISSION
## ADVICE LETTER FILING SUMMARY
### ENERGY UTILITY

**Company name/CPUC Utility No.** Pacific Gas and Electric Company (ID U39 E)

<table>
<thead>
<tr>
<th>Utility type:</th>
<th>Contact Person: Jennifer Wirowek</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ ELC</td>
<td>☐ GAS</td>
</tr>
<tr>
<td>☐ PLC</td>
<td>☐ HEAT</td>
</tr>
<tr>
<td>Phone #: (415) 973-1419</td>
<td>E-mail: <a href="mailto:J6WS@pge.com">J6WS@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
</tr>
</tbody>
</table>

**EXPLANATION OF UTILITY TYPE**

<table>
<thead>
<tr>
<th>ELC = Electric</th>
<th>GAS = Gas</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLC = Pipeline</td>
<td>HEAT = Heat</td>
</tr>
</tbody>
</table>

**Advice Letter (AL) #: 4352-E-C**

**Tier:** 2

**Subject of AL:** Supplemental: Procurement Transaction Quarterly Compliance Filing (Q4, 2013)

**Keywords (choose from CPUC listing):** Compliance, Procurement

**AL filing type:** ☑ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☑ Other Supplement to Quarterly AL

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-062

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: ____________________

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: Yes, please see Attachment 1 – Confidentiality Declaration and Matrix

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: ___ Pete Koszalka, (415) 973-3818

Resolution Required? ☐ Yes ☑ No

Requested effective date: October 17, 2014

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**

**Energy Division**

**EDTariffUnit**

505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102

**E-mail:** EDTariffUnit@cpuc.ca.gov

**Pacific Gas and Electric Company**

**Attn:** Meredith Allen

**Senior Director, Regulatory Relations**

77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**E-mail:** PGETariffs@pge.com
ATTACHMENT 1
CONFIDENTIALITY DECLARATION AND MATRIX
I, Pete Koszalka, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 2003. My current title is Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. I am responsible for physical and financial trading of gas in support of PG&E’s allocated Department of Water Resources contracts, PG&E’s Utility Retained Generation plants, and PG&E’s tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved.

2. Based on my knowledge and experience, and in accordance with Decision (“D.”) 08-04-023 and the August 22, 2006 “Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066,” I make this declaration seeking confidential treatment of the supplemental filing being filed today for PG&E’s January 30, 2014 Advice Letter 4352-E, Attachments A, B, D and M.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix I of D.06-06-066 and Appendix D.08-04-023 (the “IOU Matrix”), and/or constitutes information that should
be protected under General Order 66-C. The matrix also specifies the category or categories in
the IOU Matrix to which the data and information corresponds, and why confidential protection
is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations
specified in the IOU Matrix for that type of data or information; (2) the information is not
already public and/or cannot easily be redacted; and (3) the data cannot be aggregated, redacted,
summarized or otherwise protected in a way that allows partial disclosure. By this reference, I
am incorporating into this declaration all of the explanatory text in the attached matrix that is
pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the
foregoing is true and correct.

Executed on September 17, 2014 at San Francisco, California.

__________________/s/_____________________
Pete Koszalka
Director, Electric Gas Supply
Energy Supply Management
PACIFIC GAS AND ELECTRIC COMPANY
<table>
<thead>
<tr>
<th>Redaction Reference</th>
<th>1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)</th>
<th>2) Which category or categories in the Matrix the data corresponds to:</th>
<th>3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)</th>
<th>4) That the information is not already public (Y/N)</th>
<th>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</th>
<th>PG&amp;E’s Justification for Confidential Treatment</th>
<th>Length of Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attachment A – Physical and Financial Natural Gas Transactions</td>
<td>Y</td>
<td>Item I)B) 2) Utility recorded gas procurement and cost information XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings) Item I) A) 4) Long-term fuel (gas) buying and hedging plans</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Actual quantity and cost of procured physical spot gas are protected.</td>
<td>Utility recorded physical gas procurement and cost information is confidential for one year. Monthly procurement costs (ERRA Filings) are confidential for 3 years. Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.</td>
</tr>
</tbody>
</table>
**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)**
**QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4352-E-C**
**PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013**
**September 17, 2014**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<table>
<thead>
<tr>
<th>Redaction Reference</th>
<th>1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)</th>
<th>2) Which category or categories in the Matrix the data corresponds to:</th>
<th>3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)</th>
<th>4) That the information is not already public (Y/N)</th>
<th>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</th>
<th>PG&amp;E’s Justification for Confidential Treatment</th>
<th>Length of Time</th>
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<tbody>
<tr>
<td>Attachment B – Counterparty Information, including non-investment grade counterparties table: “List of Non-Investment Grade Counterparties”</td>
<td>N</td>
<td>CPUC General Order (&quot;G.O.&quot;) 66-C</td>
<td>N/A</td>
<td>N</td>
<td>Y</td>
<td>Counterparty sales information constitutes confidential non-utility business information protected under G.O. 66-C.</td>
<td>Indefinite</td>
</tr>
<tr>
<td>Attachment D – Natural Gas Transactions Summary</td>
<td>Y</td>
<td>Item I) B) 2) Utility recorded gas procurement and cost information</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Actual quantity and cost of procured physical term gas are protected. PG&amp;E’s hedging strategies may be deduced through an analysis of PG&amp;E’s summarized transactions.</td>
<td>Utility recorded physical gas procurement and cost information is confidential for one year. Financial transactions are confidential for three years past expiration of the last trade executed under</td>
</tr>
<tr>
<td>Redaction Reference</td>
<td>1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)</td>
<td>2) Which category or categories in the Matrix the data corresponds to:</td>
<td>3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)</td>
<td>4) That the information is not already public (Y/N)</td>
<td>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</td>
<td>PG&amp;E’s Justification for Confidential Treatment</td>
<td>Length of Time</td>
</tr>
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<tr>
<td>Attachment M – Transactions Subject to Strong Showing - Physical Natural Gas, Term Transactions, and/or Financial Natural Gas Transactions</td>
<td>Y</td>
<td>Item I) A) 4) Long-term fuel (gas) buying and hedging plans; Item I) B) 2) Utility recorded gas procurement and cost information; XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Actual quantity and cost of procured gas are protected. Each transaction is a factor in PG&amp;E’s long term buying and hedging strategies. With the entire set of transactions PG&amp;E’s counterparties could reconstruct PG&amp;E’s gas buying and hedging plans. This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per Assembly Bill 57</td>
<td>3 Years and Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.</td>
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AT&T
Alcantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Braun Blasing McLaughlin, P.C.
CENERGY POWER
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine
Casner, Steve
Center for Biological Diversity
City of Palo Alto
City of San Jose
Clean Power
Coast Economic Consulting
Commercial Energy
Cool Earth Solar, Inc.
County of Tehama - Department of Public Works
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center
Dept of General Services
Division of Ratepayer Advocates
Douglass & Liddell
Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
GenOn Energy Inc.
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
K&L Gates LLP
Kelly Group
Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District
Morgan Stanley
NLine Energy, Inc.
NRG Solar
Nexant, Inc.
North America Power Partners
Occidental Energy Marketing, Inc.
OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas
SPURR
San Francisco Public Utilities Commission
Seattle City Light
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Utility Cost Management
Utility Power Solutions
Utility Specialists
Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)